

1 J. RANDALL JONES, ESQ., SBN 1927
r.jones@kempjones.com
2 MICHAEL J. GAYAN, ESQ., SBN 11135
m.gayan@kempjones.com
3 MONA KAVEH, ESQ., SBN 11825
m.kaveh@kempjones.com
4 KEMP JONES LLP
5 3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
6 Telephone: (702) 385-6000

7 RICHARD L. STONE, ESQ. (*pro hac vice*)
rstone@jenner.com
8 DAVID R. SINGER, ESQ. (*pro hac vice*)
dsinger@jenner.com
9 AMY M. GALLEGOS, ESQ. (*pro hac vice*)
10 agallegos@jenner.com
11 JENNER & BLOCK LLP
633 West 5th Street, Suite 3600
12 Los Angeles, California 90071
Telephone: (213) 239-5100
13

14 *Attorneys for Defendants*

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 LAS VEGAS SUN, INC., a Nevada
corporation,
18
Plaintiff,

19 v.

20 SHELDON ADELSON, an individual and
as the alter ego of News+Media Capital
21 Group LLC and as the alter ego of Las
Vegas Review Journal, Inc.; PATRICK
22 DUMONT, an individual; NEWS+MEDIA
CAPITAL GROUP LLC, a Delaware
23 limited liability company; LAS VEGAS
REVIEW-JOURNAL, INC., a Delaware
24 corporation; and DOES, I-X, inclusive,

25 Defendants.
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Case No.: 2:19-cv-01667-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES TO FILE
MOTIONS AND RELATED BRIEFING
PRIOR TO THE COURT'S CASE
MANAGEMENT CONFERENCE ON
JANUARY 5, 2021**

(FIRST REQUEST)

1 Defendants NEWS+MEDIA CAPITAL GROUP LLC, LAS VEGAS REVIEW-
2 JOURNAL, INC., SHELDON ADELSON, and PATRICK DUMONT (together collectively
3 referred to herein as “Defendants”), by and through their counsel of record, KEMP JONES, LLP,
4 and JENNER & BLOCK, LLP, and Plaintiff LAS VEGAS SUN, INC. (“Sun”), by and through
5 its counsel LEWIS ROCA ROTHGERBER CHRISTIE, LLP, PISANELLI BICE PLLC, and
6 THE ALIOTO LAW FIRM, hereby stipulate and agree as follows:

7 1. Pursuant to this Court’s June 4, 2020 Scheduling Order, the parties have “21 days
8 prior to each Case Management Conference . . . [to] file any motions deemed appropriate, with
9 oppositions due 10 days later, and replies due 4 days thereafter.” ECF No. 74 at 5:1–4. The next
10 Case Management Conference (“CMC”) is scheduled for January 5, 2021, generating a December
11 15, 2020, deadline to file motions. Due to the upcoming holidays, the deadline to file oppositions
12 and replies would be December 28, 2020, January 4, 2021, respectively.

13 2. Following a meet and confer, Counsel agree that the motion deadline, as presently
14 set, does not allow sufficient time for the parties to complete their meet-and-confer discussions
15 that may eliminate or narrow the scope of potential motions. The parties also wish to avoid an
16 expedited briefing schedule during the holiday season, particularly with oppositions due the first
17 judicial day after Christmas Day and replies due the first judicial day after New Year’s Day.
18 Further, given the narrow timespan between the reply deadline, presently set for January 4, 2021,
19 and the next CMC, set for January 5, 2021, Counsel for the parties recognize the Court may desire
20 additional time to consider the parties’ briefs prior to hearing argument on the same, particularly
21 in light of the pending motions already set to be heard that day.

22 3. Accordingly, the parties agree to modify the deadlines set forth in the Court’s
23 Scheduling Order for the parties to file appropriate pre-CMC motions as follows:

- 24 a. The parties shall have until December 22, 2020, to file appropriate motions;
25 b. The parties shall have until January 5, 2021, to file oppositions to any such
26 motions; and
27 c. The parties shall have until January 12, 2021, to file replies in support of
28 any such motions.

4. The aforementioned filing and briefing extensions are necessary to allow the parties sufficient time to engage in additional meet-and-confer discussions to attempt to narrow the issues before the Court at the time of hearing and to review and succinctly respond to any motions that may be filed.

5. The stipulated extensions to the filing and briefing schedule set forth in the Scheduling Order will not prejudice the parties, nor will it impact other Court-imposed deadlines established in this case. This is the first request for a continuance of these briefing deadlines.

DATED this 15th day of December, 2020.

KEMP JONES, LLP

/s/ Michael J. Gayan

J. Randall Jones, Esq., Bar No. 1927
Michael J. Gayan, Esq., Bar No. 11135
Mona Kaveh, Esq., Bar No. 11825
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, NV 89169

Richard L. Stone, Esq., *Pro Hac Vice*
Amy M. Gallegos, Esq., *Pro Hac Vice*
David R. Singer, Esq., *Pro Hac Vice*
JENNER & BLOCK LLP
633 West 5th Street, Suite 3600
Los Angeles, CA 90071

Attorneys for Defendants

DATED this 15th day of December, 2020.

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

/s/ Marla J. Hudgens

E. Leif Reid, Bar No. 5750
Kristen L. Martini, Bar No. 11272
Marla J. Hudgens, Bar No. 11098
Nicole Scott, Bar No. 13757
One East Liberty Street, Suite 300
Reno, NV 89501-2128

Joseph M. Alioto, *Pro Hac Vice*
Jamie L. Miller, *Pro Hac Vice*
ALIOTO LAW FIRM
One Sansome Street, 35th Floor
San Francisco, CA 94104

James J. Pisanelli, Bar No. 4027
Todd L. Bice, Bar No. 4534
Jordan T. Smith, Bar No. 12097
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED

DATED: 11:13 am, December 18, 2020

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE